

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Gary S. Lee
Lorenzo Marinuzzi
Norman S. Rosenbaum

*Counsel for the Debtors and
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**AMENDED¹ PROPOSED AGENDA FOR MATTERS SCHEDULED
TO BE HEARD ON SEPTEMBER 11, 2013 AT 10:00 A.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY
10004-1408

I. ADJOURNED MATTERS

1. Motion of Winland and Irma Elizabeth Smith for Relief from Stay [Docket No. 4615]

Related Document(s):

- a. Notice of Adjournment of Hearing on Motion of Winland and Irma
Elizabeth Smith for Relief from Stay to October 9, 2013 at 10:00 a.m.
[Docket No. 4973]

Response(s): None.

Status: The hearing on this matter has been adjourned to October 9, 2013.

¹ Amended items appear in **bold**.

2. Debtors' Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4632]

Related Document(s):

- a. Debtors' Motion to Shorten Notice of the Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4646]
- b. Order Shortening the Notice Period for Hearing on the Debtors' Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4790]
- c. Notice of Adjournment of Hearing on Debtors' Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4969]

Response(s):

- a. Response of Syncora Guarantee Inc. to Debtors' Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4925]
 - (i) Declaration of Randall R. Rainer in Support of Response of Syncora Guarantee Inc. to Debtors' Objection to Proof of Claim # 2781 of Syncora Guarantee Inc. [Docket No. 4926]

Status: The hearing on this matter has been adjourned to September 24, 2013.

3. Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing Related Agreements with Impac Funding Corporation and Impac Mortgage Holdings, Inc. [Docket No. 4744]

Related Document(s):

- a. Notice of Adjournment of Hearing on Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing Related Agreements with Impac Funding Corporation and Impac Mortgage Holdings, Inc. to October 9, 2013 at 10:00 a.m. [Docket No. 4986]

Response(s):

- a. Limited Objection of the IMPAC Companies to Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing Related Agreements with IMPAC Funding Corporation and IMPAC Mortgage Holdings, Inc. [Docket No. 4882]

Status: The hearing on this matter has been adjourned to October 9, 2013.

II. ADJOURNED ADVERSARY PROCEEDING MATTERS

Universal Restoration Services, Inc. v. GMAC Mortgage, LLC (Adv. Proc. No. 13-01278)

1. Defendant's Motion to Dismiss Plaintiff's Adversary Complaint [Docket No. 9]

Related Document(s):

- a. Stipulation and Order Extending the Time for Plaintiff Universal Restoration Services, Inc. to Respond to Defendant GMAC Mortgage LLC's Motion to Dismiss [Docket No. 12]
- b. Stipulation and Order Extending the Time for Plaintiff Universal Restoration Services, Inc. to Respond to Defendant GMAC Mortgage LLC's Motion to Dismiss [Docket No. 13]
- c. Stipulation and Order Extending the Time for Plaintiff Universal Restoration Services, Inc. to Respond to Defendant GMAC Mortgage LLC's Motion to Dismiss [Docket No. 17]
- d. Stipulation and Order Extending the Time for Plaintiff Universal Restoration Services, Inc. to Respond to Defendant GMAC Mortgage LLC's Motion to Dismiss [Docket No. 20]
- e. Stipulation and Order Extending the Time for Defendant GMAC Mortgage to Reply to Plaintiff Universal Restoration Services, Inc.'s Opposition to Motion to Dismiss [Docket No. 23]

Response(s):

- a. Universal Restoration Services, Inc.'s Response to GMAC Mortgage, LLC's Motion to Dismiss Adversary Complaint [Docket No. 21]

Status: The hearing on this matter has been adjourned to October 23, 2013.

Wilson v. Residential Capital LLC (Adv. Proc. No. 12-01936)

1. Status Conference

Related Document(s):

- a. Complaint [Docket No. 1]
- b. Amended Summons with Notice of Pre-Trial Conference [Docket No. 3]
- c. Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 4]

- d.** Amended Notice of Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 5]
- e.** Notice of Adjournment of Pretrial Conference [Docket No. 6]
- f.** Notice of Adjournment of Hearing on Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 11]
- g.** Notice of Adjournment of Hearing on Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 13]
- h.** Plaintiff's Opposition to Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 14]
- i.** Memorandum of Points and Authorities in Support of Plaintiff's Opposition to Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 15]
- j.** Plaintiff's Objection to Declaration of Jennifer Scoliard, In-House Senior Bankruptcy Counsel at Residential Capital, LLC, in Support of Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 16]
- k.** Memorandum of Points and Authorities in Support of Plaintiff's Objection to Declaration of Jennifer Scoliard, In-House Senior Bankruptcy Counsel at Residential Capital, LLC, in Support of Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 17]
- l.** Amended Notice of Adjournment of Hearing on Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) Or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1) [Docket No. 19]
- m.** Notice of Applicability of the Order Approving Mandatory Supplemental AP Procedures for AP Actions [Docket No. 21]

- n. Joint Progress Report [Docket No. 23]
- o. Joint Progress Report [Docket No. 25]
- p. Joint Progress Report [Docket No. 27]
- q. Joint Progress Report [Docket No. 29]
- r. **Notice of Adjournment of Status Conference [Docket No. 31]**

Status: The status conference on this matter has been adjourned to a date to be determined.

III. CONTESTED MATTERS

1. Debtors' Objection to Proof of Claim of PNC Bank, N.A. (Claim No. 4760) [Docket No. 4603]

Related Document(s): None.

Response(s):

- a. PNC Bank N.A.'s Response and Reservation of Rights to Debtors' Objection to Proof of Claim No. 4760 [Docket No. 4894]

Replies:

- a. Reply in Further Support of the Debtors' Objection to Proof of Claim of PNC Bank, N.A. (Claim No. 4760) [Docket No. 4978]

Status: The hearing on this matter will be going forward.

2. Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing-Related Agreements for Trusts Insured by Syncora Guarantee Inc. to Ocwen Loan Servicing, LLC [Docket No. 4718]

Related Document(s): None.

Response(s):

- a. Reservation of Rights in Response to Debtors' Motion Under Section 365 of The Bankruptcy Code to Assume and Assign Servicing-Related Agreements for Trusts Insured by Syncora Guarantee Inc. to Ocwen Loan Servicing, LLC [Docket No. 4830]
- b. Objection of Syncora Guarantee Inc. to Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing-Related Agreements for Trusts Insured by Syncora Guarantee Inc. to Ocwen Loan Servicing, LLC [Docket No. 4870]

- c. Wells Fargo Bank, N.A.'s Reservation of Rights in Response to Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing-Related Agreements for Trusts Insured by Syncora Guarantee, Inc. to Ocwen Loan Servicing, LLC [Docket No. 4916]

Reply:

- a. Debtors' Reply to Objection of Syncora Guarantee Inc. to Debtors' Motion Under Section 365 of the Bankruptcy Code to Assume and Assign Servicing-Related Agreements for Trusts Insured by Syncora Guarantee Inc. to Ocwen Loan Servicing, LLC [Docket No. 4976]

Status: The hearing on this matter will be going forward only with respect to whether Syncora's cure claim is limited to damages for breaches, if any, of the Syncora Agreements that occurred after September 28, 2012 that are either agreed to by the Debtors or determined by the Court. The remaining issues in connection with the motion will be adjourned to a mutually agreed date between the parties.

IV. INTERIM FEE APPLICATIONS²

Debtors' Professionals

1. Third Interim Application of Bradley Arant Boult Cummings LLP as Special Litigation and Compliance Counsel for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4513]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

2. Third Interim Application of Carpenter Lipps & Leland LLP as Special Litigation Counsel for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4557]

Related Document(s):

- a. Statement Regarding Resolution of United States Trustee's Objection to Carpenter Lipps & Leland's Third Interim Fee Application [Docket No. 4966]

² As used in this Section IV, the "U.S. Trustee's Omnibus Objection" refers to the *Omnibus Objection of the United States Trustee Regarding Fee Application for Third Interim Awards of Compensation and Reimbursement of Out-of-Pocket Expenses* [Docket No. 4869].

Response(s):

a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

3. Third Interim Application of Centerview Partners LLC as Investment Banker for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4528]

Response(s):

a. U.S. Trustee's Omnibus Objection

Status: **The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.**

4. Third Interim Application of Curtis, Mallet-Prevost, Colt & Mosle LLP, as Conflicts Counsel to the Debtors and Debtors in Possession, for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through and Including April 30, 2013 [Docket No. 4532]

Response(s):

a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

5. Third Interim Application of Deloitte & Touche LLP for Compensation of Services Rendered and Reimbursement of Expenses as Independent Auditor and Attest Service Provider to the Debtors for the Period from January 1, 2013 through April 30, 2013 [Docket No. 4511]

Response(s):

a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

6. Third Interim Application of Dorsey & Whitney LLP as Special Securitization and Investigatory Counsel for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4420]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

7. First Interim Application of Ernst & Young LLP for Allowance and Payment of Compensation for Professional Services and Reimbursement of Actual and Necessary Expenses (for the Period October 1, 2012 through April 30, 2013) [Docket No. 4526]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

8. Third Interim Application of FTI Consulting, Inc., as Financial Advisor for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4542]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Declaration of William J. Nolan on Behalf of FTI Consulting, Inc. in Reply to Omnibus Objection of the United States Trustee Regarding Fee Applications for Third Interim Awards of Compensation and Reimbursement of Out-of-Pocket Expenses and in Support of Third Interim Fee Applications of FTI Consulting, Inc. [Docket No. 4991]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

9. Second Interim Application of Hudson Cook LLP as Special Counsel to the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4520]

Related Document(s):

- a. **Notice of Adjournment of Hearing on Second Interim Application of Hudson Cook, LLP as Special Counsel to the Debtors For Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 Through April 30, 2013 [Docket No. 5006]**

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The hearing on this matter is being adjourned to a date to be determined.

10. Third Fee Application of KPMG LLP, as Tax Compliance Professionals and Information Technology Advisors to the Debtors and Debtors in Possession, for Interim Allowance and Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through April 30, 2013 [Docket No. 4512]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

11. Third Interim Fee Application of Locke Lord LLP for Compensation and Reimbursement of Expenses for the Period from January 1, 2013 through April 30, 2013 as Litigation Counsel for Debtors [Docket No. 4507]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

12. Third Interim Application of Mercer (US) Inc. as Compensation Consultant to the Debtors for the Period from January 1, 2013 through April 30, 2013 [Docket No. 4558]

Related Document(s):

- a. **Supplement to Third Interim Application of Mercer (US) Inc. as Compensation Consultant to the Debtors for the period from January 1, 2013 through April 30, 2013 [Docket No. 5000]**

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

13. Third Interim Application of Morrison Cohen LLP for Allowance of Interim Compensation for Professional Services Rendered and Expenses Incurred During the Period January 1, 2013 through April 30, 2013 [Docket No. 4527]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

14. Third Interim Application of Morrison & Foerster LLP as Bankruptcy Counsel for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4551]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. Morrison & Foerster LLP's Reply to Omnibus Objection of the United States Trustee Regarding Fee Applications for Third Interim Awards of Compensation and Reimbursement of Out-Of-Pocket Expenses [Docket No. 4979]

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

15. Third Interim Application of Orrick, Herrington & Sutcliffe LLP as Special Securitization Transactional and Litigation Counsel for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4529]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

16. Second Interim Application of Pepper Hamilton LLP as Special Foreclosure Review Counsel for Bankruptcy Issues for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4521]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: **The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.**

17. First Interim Application of Perkins Coie LLP as Special Insurance Coverage Counsel to the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period March 20, 2013 through April 30, 2013 [Docket No. 4533]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

18. Third Interim Application of Rubenstein Associates, Inc. as Corporate Communications Consultant for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4523]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

19. Third Interim Application of Severson & Werson, P.C. as Special California Litigation Counsel for Debtors for Compensation and Reimbursement of Expenses Incurred for the Time Period Between January 1, 2013 through April 30, 2013 [Docket No. 4458]

Related Document(s):

- a. Statement of Resolution of Omnibus Objection of the United States Trustee Regarding Severson & Werson, P.C.'s Third Application for Compensation and Reimbursement of Expenses Incurred for the Time Period January 1, 2013, Through April 30, 2013 And Reply To Objection of Creditor, Erlinda Abibas Aniel [Docket No. 4982]

Response(s):

- a. Objection of Creditor Erlinda Abibas Aniel Regarding Fee Application For the Third Interim Award of Compensation by Severson & Werson, P.C. [Docket No. 4514]
- b. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

20. Third Interim Application of Towers Watson Delaware Inc. as Human Resources Consultant for the Debtors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4455]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

21. Application of Troutman Sanders LLP for an Award of Compensation and Reimbursement of Expenses for Services Rendered as an Ordinary Course Professional for the Debtors for the following Periods: January 1 – 31, 2013, February

1 - 28, 2013, and April 1 – 30, 2013 and Third Interim Application of Troutman Sanders LLP for an Award of Compensation and Reimbursement of Expenses for Services Rendered as an Ordinary Course Professional for the Debtors for the Period of January 1, 2013 through April 30, 2013 [Docket No. 4547]

Related Document(s):

- a. **Statement of Resolution of Omnibus Objection of the United States Trustee Regarding Troutman Sanders LLP's Third Fee Application for Interim Compensation and Reimbursement of Expenses filed by Troutman Sanders LLP [Docket No. 4992]**

Response(s): None.

Status: Prior to the filing of the UST's Omnibus Objection, Troutman Sanders contacted the UST and voluntarily agreed to reduce its fees by \$949.00 for the use of transitory timekeepers. The hearing on this application will be going forward.

Committee's Professionals

- 22. Third Interim Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Compensation and Reimbursement of Expenses for the Period January 1, 2013 through April 30, 2013 [Docket No. 4563]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

- 23. Second Application of Analytic Focus, LLC, Consultant to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 Through April 30, 2013 [Docket No. 4571]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

24. Second Interim Application of Coherent Economics, LLC as Consultant to the Official Committee of Unsecured Creditors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 through April 30, 2013 [Docket No. 4570]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

25. Second Interim Application of Epiq Bankruptcy Solutions, LLC, as Information Agent for the Official Committee of Unsecured Creditors, for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through April 30, 2013 [Docket No. 4561]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: **The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.**

26. Second Application of J.F. Morrow, Consultant to the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through April 30, 2013 [Docket No. 4569]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

27. Third Application of Kramer Levin Naftalis & Franklin LLP, Counsel for the Official Committee of Unsecured Creditors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through April 30, 2013 [Docket No. 4573]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

28. Third Interim Application of Moelis & Company LLC for Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred as Investment Banker to the Official Committee of Unsecured Creditors for the Period from January 1, 2013 through April 30, 2013 [Docket No. 4564]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

29. Second Interim Application of Pachulski Stang Ziehl & Jones LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period from January 1, 2013 through April 30, 2013 [Docket No. 4534]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

30. Second Interim Application of San Marino Business Partners LLC as Consultant to the Official Committee of Unsecured Creditors for Compensation and Reimbursement of Expenses Incurred for the Period January 1, 2013 Through April 30, 2013 [Docket No. 4572]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

31. Second Interim Application of SilvermanAcampora LLP, Special Counsel to Official Committee of Unsecured Creditors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2013 through April 30, 2013 [Docket No. 4538]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Reply:

- a. **Omnibus Response of Certain Committee Professionals With Respect to the U.S. Trustee's Objection to the Third Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 5003]**

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

32. First Interim Fee Application of Wilmer Cutler Pickering Hale and Dorr LLP, as Special Counsel for Certain Regulatory Matters to the Official Committee of Unsecured Creditors of Residential Capital, LLC, *et al.* for Interim Allowance of Compensation and for the Reimbursement of Expenses for Services Rendered During the Period from December 12, 2012 through April 30, 2013 [Docket No. 4537]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

Examiner's Professionals

33. Third Interim Fee Application of Chadbourne & Parke LLP, Counsel to the Examiner, for Allowance of Compensation and Reimbursement of Expenses for the Period January 1, 2013 Through and Including April 30, 2013 [Docket No. 4565]

Response(s):

a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

34. Third Interim Fee Application of Arthur J. Gonzalez, as Chapter 11 Examiner, for Allowance of Compensation and Reimbursement of Expenses for the Period January 1, 2013 Through and Including April 30, 2013 [Docket No. 4566]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

35. First Interim Application of Leonard, Street and Deinard Professional Association, Special Minnesota Counsel to the Examiner, for Allowance of Compensation and Reimbursement of Expenses for the Period from April 15, 2013 Through and Including April 30, 2013 [Docket No. 4559]

Response(s): None.

Status: This application is uncontested. The hearing on this application will be going forward.

36. Third Interim Fee Application of Mesirow Financial Consulting, LLC for Compensation and Reimbursement of Expenses as Financial Advisor to the Examiner for the Period January 1, 2013 through April 30, 2013 [Docket No. 4562]

Response(s):

a. U.S. Trustee's Omnibus Objection

Reply:

a. Declaration of Melissa Kibler Knoll on Behalf of Mesirow Financial Consulting in Response to the Omnibus Objection of the United States Trustee Regarding Fee Applications for Third Interim Awards of Compensation and Reimbursement of Out-of-Pocket Expenses [Docket No. 5001]

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

37. Second Interim Fee Application of Wolf Haldenstein Adler Freeman & Herz LLP, Conflicts Counsel to the Examiner, for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2013 Through and Including April 30, 2013 [Docket No. 4560]

Response(s):

- a. U.S. Trustee's Omnibus Objection

Status: The U.S. Trustee's Omnibus Objection to this application has been resolved. The hearing on this application will be going forward.

V. **CURE OBJECTIONS HEARING:**

1. **Sale Motion:** Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), and (m), 365 and 1123, and Fed. R. Bankr. P. 2002, 6004, 6006, and 9014 for Orders: (A)(I) Authorizing and Approving Sale Procedures, Including Break-Up Fee and Expense Reimbursement; (II) Scheduling Bid Deadline and Sale Hearing; (III) Approving Form and Manner of Notice Thereof; and (IV) Granting Related Relief and (B)(I) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (II) Authorizing and Approving Asset Purchase Agreements Thereto; (III) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto; and (IV) Granting Related Relief [Docket No. 61]

Related Document(s):

- a. **Sale Procedures Order:** Order Under 11 U.S.C. §§ 105, 363(b) and 365 (I) Authorizing and Approving Sale Procedures, Including Payment of Break-up Fees; (II) Scheduling Bid Deadline, Auction (If Necessary) and Sale Hearing; (III) Establishing Assumption and Assignment Procedures, Including Procedures for Fixing Cure Amounts; and (IV) Establishing Notice Procedures and Approving Forms of Notice [Docket No. 538]

Cure Notices

- (i) Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto [Docket No. 924]
- (ii) First Supplemental Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto [Docket No. 1459]

- (iii) First Amended and Restated Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto [Docket No. 1484]
 - (iv) First Notice of (I) Debtors' Intent to Assume and Assign Certain SBO Servicing Agreements as Executory Contracts and (II) Cure Amounts Related Thereto [Docket No. 2076]
 - (v) Second Notice of (I) Debtors' Intent to Assume and Assign Certain SBO Servicing Agreements as Executory Contracts and (II) Cure Amounts Related Thereto [Docket No. 2077]
 - b. **Ocwen Sale Order:** Order Under 11 U.S.C. §§ 105, 363 and 365 and Fed. R. Bankr. P. 2002, 6004, 6006 and 9014 (I) Approving (A) Sale of Debtors' Assets Pursuant to Asset Purchase Agreement with Ocwen Loan Servicing, LLC; (B) Sale of Purchased Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests; (C) Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Thereto; (D) Related Agreements; and (II) Granting Related Relief [Docket No. 2246]
 - c. **Ocwen APA:** Ocwen Loan Servicing, LLC Asset Purchase Agreement (as attached as Exhibit 1 to Amended Notice of Successful Bidders at the Auctions and Sales of (A) The Platform Assets to Ocwen Loan Servicing, LLC and (B) The Whole Loan Assets to Berkshire Hathaway Inc. and Notice of Filing (A) Ocwen APA and (B) Amended and Restated BH Legacy APA) [Docket No. 2050]
 - d. **Berkshire Hathaway Sale Order:** Order Under 11 U.S.C. §§ 105, 363 and 365 and Fed. R. Bankr. P. 2002, 6004, 6006 and 9014 (I) Approving (A) Sale of Debtors' Assets Pursuant to Asset Purchase Agreement with Berkshire Hathaway, Inc.; (B) Sale of Purchased Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests; and (C) Related Agreements; and (II) Granting Related Relief [Docket No. 2247]
 - e. **Berkshire Hathaway APA:** Berkshire Hathaway Inc. Amended and Restated Asset Purchase Agreement (as attached as Exhibit 4 to Amended Notice of Successful Bidders at the Auctions and Sales of (A) The Platform Assets to Ocwen Loan Servicing, LLC and (B) The Whole Loan Assets to Berkshire Hathaway Inc. and Notice of Filing (A) Ocwen APA and (B) Amended and Restated BH Legacy APA) [Docket No. 2050]

Resolved Cure Objection(s):

- a. Limited Objection of Financial Guaranty Insurance Company to the Debtors' Sale Motion and Assumption Notice Docket No. 1746]

- (i) Declaration of Lori Sinanyan in Support of the Limited Objection of Financial Guaranty Insurance Company to the Debtors' Sale Motion and Assumption Notice] [Docket No 1748]
- (ii) Memorandum Endorsed So-Ordered Letter dated March 13, 2013 from Gary T. Holtzer, Counsel to Syncora Guarantee Inc., Regarding Status of Syncora's Limited Objections to Debtors' Sale of Mortgage Servicing Platform to Ocwen Loan Servicing, LLC, Given Pendency of Similar Outstanding Sale Objections [Docket No. 3186]
- (iii) Joint Scheduling Order Regarding Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 3449]
- (iv) Amendment to Joint Scheduling Order Regarding Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 3706]
- (v) Second Amendment to Joint Scheduling Order Regarding Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 3776]
- (vi) Third Amendment to Joint Scheduling Order Regarding Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 3962]
- (vii) Notice of Adjournment of Hearing on the Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 3990]
- (viii) Notice of Adjournment of Hearing on the Limited Objection of Financial Guaranty Insurance Company to Debtors' Sale Motion and Assumption Notice [Docket No. 4346]

Status: This matter has been resolved. No hearing is required.

Replies:

- a. Debtors' Omnibus Reply to Objections to Debtors' Sale Motion [Docket No. 2135]

- b. Debtors' Omnibus Reply to Objections to the (A) Assumption and Assignment of Certain Agreements and (B) Related Cure Amounts [Docket No. 2574]

VI. OMNIBUS CLAIMS OBJECTIONS

- 1. Debtors' First Omnibus Objection to Claims (Late-Filed Claims) [Docket No. 3573]

Related Document(s):

- a. Notice of Hearing on Debtors' First Omnibus Objection to Claims (Late-Filed Claims) Against Angela Genesco (Claim No. 5732) and Kroll Ontrack (Claim No. 6325) on July 15, 2013 at 11:00 a.m. [Docket No. 4000]
- b. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection to Claims (Late-Filed Claims) Against Kroll Ontrack (Claim No. 6325) to July 26, 2013 at 10:00 a.m. [Docket No. 4210]
- c. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection to Claims (Late-Filed Claims) Against Kroll Ontrack (Claim No. 6325) to August 29, 2013 at 10:00 a.m. [Docket No. 4315]
- d. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection to Claims (Late-Filed Claims) Against Kroll Ontrack (Claim No. 6325) to September 11, 2013 at 10:00 a.m. [Docket No. 4857]
- e. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection to Claims (Late-Filed Claims) Against Kroll Ontrack (Claim No. 6325) to October 2, 2013 at 10:00 a.m. [Docket No. 4975]

Response(s):

- a. Objection of Kroll Ontrack, Inc. to the Debtors' First Omnibus Objection to Claims (Late-Filed Claims) [Docket No. 4162]

Status: The hearing on the matter relating to the Objection of Kroll Ontrack, Inc. has been adjourned to October 2, 2013.

- 2. Debtors' Tenth Omnibus Claims Objection (Facially Defective and Time-Barred Securities Claims) [Docket No. 4119]

Related Document(s):

- a. Declaration of Lewis Kruger in Support of the Debtors' Tenth Omnibus Claims Objection [Docket No. 4120]

- b. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- c. Notice of Adjournment of Hearing on Debtors' Tenth Omnibus Claims Objection (Facially Defective and Time-Barred Securities Claims) Against Everest Companies and MetLife Companies Proofs of Claim to September 11, 2013 at 10:00 a.m. [Docket No. 4726]
- d. Notice of Adjournment of Hearing on Debtors' Tenth Omnibus Claims Objection (Facially Defective and Time-Barred Securities Claims) Against Everest Companies and MetLife Companies Proofs of Claim to September 24, 2013 at 10:00 a.m. [Docket No. 4983]

Response(s):

- a. Everest Reinsurance (Bermuda), Ltd.'s Opposition to Tenth Omnibus Objection to Claims (Facially Defective and Time-Barred Securities Claims) (Claim No. 3480) [Docket No. 4334]
- b. Everest Reinsurance (Bermuda), Ltd.'s Opposition to Tenth Omnibus Objection to Claims (Facially Defective and Time-Barred Securities Claims) (Claim No. 3481) [Docket No. 4337]

Status: The hearing on this matter as it relates to the Everest Companies and the MetLife Companies has been adjourned to September 24, 2013.

- 3. Debtors' Eleventh Omnibus Objection to Claims (Misclassified Claims) [Docket No. 4145]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Notice of Adjournment of Hearing on Debtors' Eleventh Omnibus Claims Objection (Misclassified Claims) Solely with Respect to the Claim Filed by B. Fischer Construction, LLC (Claim No. 2563) to September 11, 2013 at 10:00 a.m. [Docket No. 4848]
- b. Notice of Adjournment of Hearing on Debtors' Eleventh Omnibus Claims Objection (Misclassified Claims) Solely with Respect to the Claim Filed by B. Fischer Construction, LLC (Claim No. 2563) to October 23, 2013 at 10:00 a.m. [Docket No. 4988]

Response(s):

- a. Response of B Fischer Construction LLC to Eleventh Omnibus Objection to Claims (Misclassified Claims) [Docket No. 4398]

Status: The hearing on this matter as it relates to B. Fischer Construction, LLC has been adjourned to October 23, 2013.

4. Debtors' Thirteenth Omnibus Objection to Claims (No Liability – Books and Records Tax Claims) [Docket No. 4147]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Notice of Adjournment of Hearing on Debtors' Thirteenth Omnibus Claims Objection (No Liability – Books and Records Tax Claims) Solely with Respect to the Claims Filed by (1) J. Dennis Semler, Tulsa County Treasurer (Claim No. 208), (2) Rose Plympton, Treasurer in and for the County of Elmore, Idaho (Claim No. 2455), and (3) Butte County Tax Collector (Claim No. 1104) to September 11, 2013 at 10:00 a.m. [Docket No. 4847]
- c. Notice of Adjournment of Hearing on Debtors' Thirteenth Omnibus Objection to Claims (No Liability - Books and Records Tax Claims) Against (1) Butte County Tax Collector (Claim No. 1104) and (2) Rose Plympton, Treasurer in and for the County of Elmore, Idaho (Claim No. 2455) to October 23, 2013 at 10:00 a.m. [Docket No. 4989]

Response(s):

- a. Objection of J. Dennis Semler, Tulsa County Treasurer, to Debtors' Thirteenth Omnibus Objection to Claims (No Liability – Books and Records Tax Claims [Docket No. 4374]
 - (i) Notice of Withdrawal of Proof of Claim [Docket No. 4914]
- b. Response of Rose Plympton, Treasurer in and for the County of Elmore, Idaho, to Debtors' Thirteenth Omnibus Objection to Claims (No Liability – Books and Records Tax Claims [Docket No. 4375]
- c. Butte County Tax Collector Rebuttal to Thirteenth Omnibus Objection to Claims [Docket No. 4381]

Status: **No hearing is required for this matter as it relates to J. Dennis Semler, Tulsa County Treasurer, which is being consensually resolved.** The hearing as it relates to (i) Rose Plympton, Treasurer in and for the County of Elmore, Idaho, and (ii) the Butte County Tax Collector has been adjourned to October 23, 2013.

5. Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4151]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Debtors' Omnibus Reply in Support of Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4843]
- c. Notice of Adjournment of Hearing on Debtors' Seventeenth, Eighteen, Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. (Prevailing Eastern Time [Docket No. 4872]

Response(s):

- a. Response of Michelle R. Strickland to Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4338]
- b. Response of Perry Goerner to Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4469]
- c. Perry Goerner's Response to Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4579]
- d. Objection of Creditor Anthony Davide to the Reclassification of Claim from Secured to Unsecured [Docket No. 4651]
- e. Response of James D. Derouin to Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) [Docket No. 4752]
 - (i) Notice of Withdrawal of Response to Debtors' Seventeenth Omnibus Objection to Claims (Misclassified Borrower Claims) filed by James Derouin [Docket No. 4964]

Status: The hearing on this matter as it relates to Michelle R. Strickland, Perry Goerner and Anthony Davide will be going forward. The response of James D. Derouin has been withdrawn.

- 6. Debtors' Eighteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4154]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]

- b. Debtors' Omnibus Reply in Support of Debtors' Eighteenth, Nineteenth, Twentieth, and Twenty-First Omnibus Claims Objections to Borrower Claims with Insufficient Documentation [Docket No. 4842]
- c. Notice of Adjournment of Hearing on Debtors' Seventeenth, Eighteen, Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. (Prevailing Eastern Time [Docket No. 4872])

Response(s):

- a. Brian Edmond Bath's Response and Objection to Debtors' Motion to Disallow and Expunge for Failure to Show Supporting Documentation [Docket No. 4467]
- b. Response of Ailette Cornelius to Debtors' Eighteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4518]

Status: The hearing on this matter as it relates to Brian Edmond Bath and Ailette Cornelius will be going forward.

- 7. Debtors' Nineteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4155]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Debtors' Omnibus Reply in Support of Debtors' Eighteenth, Nineteenth, Twentieth, and Twenty-First Omnibus Claims Objections to Borrower Claims with Insufficient Documentation [Docket No. 4842]
- c. Notice of Adjournment of Hearing on Debtors' Seventeenth, Eighteen, Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. (Prevailing Eastern Time [Docket No. 4872])
- d. Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-Second Omnibus Objections to Claims with Respect to Certain Claimants to September 24, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 4987]
- e. **Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 5007]**

Response(s):

- a. Response of Gary T. Harper and Julie L. Franklin-Harper to Debtors' Nineteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4497]
- b. Response of Joan Johnson to Debtors' Nineteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4517]
- c. Response of Julian A. Ortiz and Frances Soto-Ortiz to Nineteenth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4662]

Status: The hearing on this matter as it relates to Joan Johnson will be going forward. The hearing on this matter as it relates to Julian Ortiz and Frances Soto-Ortiz and Gary T. Harper and Julie L. Franklin-Harper has been adjourned to September 24, 2013.

- 8. Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4156]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Debtors' Omnibus Reply in Support of Debtors' Eighteenth, Nineteenth, Twentieth, and Twenty-First Omnibus Claims Objections to Borrower Claims with Insufficient Documentation [Docket No. 4842]
- c. Notice of Adjournment of Hearing on Debtors' Twentieth and Twenty-First Omnibus Claims Objections with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. [Docket No. 4854]
- d. Notice of Adjournment of Hearing on Debtors' Seventeenth, Eighteen, Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. (Prevailing Eastern Time [Docket No. 4872]
- e. Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-Second Omnibus Objections to Claims with Respect to Certain Claimants to September 24, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 4987]
- f. **Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 5007]**

Response(s):

- a. Response of Patricio Sulit to Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4344]
- b. Creditor Ariel Barel's Response in Opposition to Debtors' Objection to Disallow Claim [Docket No. 4515]
- c. Response of Mark Ragonese to Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4519]
- d. Response of Lucious Hughes to Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4617]
- e. Letter of Lucious Hughes Opposing the Court's Adjournment of the Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) to September 11, 2013 [Docket No. 4892]
- f. Response of Lucious Hughes to Debtors' Twentieth Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4981]

Status: The hearing on this matter as it relates to Leilani Sulit and Lucious Hughes will be going forward. The hearing on this matter as it relates to Mark Ragonese has been adjourned to September 24, 2013. The hearing on this matter as it relates to Karen Barel and Ariel Barel has been adjourned to October 9, 2013.

9. Debtors' Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4158]

Related Document(s):

- a. Notice of Adjournment of Certain Matters Scheduled for August 21, 2013 Omnibus Hearing to August 29, 2013 [Docket No. 4312]
- b. Debtors' Omnibus Reply in Support of Debtors' Eighteenth, Nineteenth, Twentieth, and Twenty-First Omnibus Claims Objections to Borrower Claims with Insufficient Documentation [Docket No. 4842]
- c. Notice of Adjournment of Hearing on Debtors' Twentieth and Twenty-First Omnibus Claims Objections with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. [Docket No. 4854]

- d. Notice of Adjournment of Hearing on Debtors' Seventeenth, Eighteen, Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants to September 11, 2013 at 10:00 a.m. (Prevailing Eastern Time [Docket No. 4872])
- e. Notice of Adjournment of Hearing on Debtors' Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) Solely with Respect to the Claims Filed by Sheldon Williams (Claim No. 1520) and Robert and Amanda Duenner (Claim No. 1473) to September 11, 2013 at 10:00 a.m. [Docket No. 4898]
- f. **Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-First Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 5007]**

Response(s):

- a. Tom Franklin's Response to Debtors' Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4282]
- b. Response of Harleston Law Firm to Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4663]
- c. Borrower Sonya Anthony Curry's Response to Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4668]
- d. Supplemental Response of Tom Franklin to Debtors' Twenty-First Omnibus Objection to Claims [Docket No. 4961]
- e. Response of Tom Franklin to Debtors' Twenty-First Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4980]

Status: The hearing on this matter as it relates to Tom Franklin and the Harleston Law Firm will be going forward. The hearing on this matter as it relates to Sonya Anthony Curry has been adjourned to September 24, 2013.

- 10. Debtors' Twenty-Second Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation) [Docket No. 4199]

Related Document(s):

- a. Notice of Adjournment of Hearing on Twenty-Second Omnibus Objection to Claims with Respect to Claimant William C. Walker to September 11, 2013 at 10:00 a.m. [Docket No. 4853]
- b. Notice of Adjournment of Hearing on Debtors' Nineteenth, Twentieth and Twenty-Second Omnibus Objections to Claims with Respect to Certain Claimants to September 24, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 4987]

Response(s): None.

Status: The hearing on this matter as it relates to William C. Walker has been adjourned to September 24, 2013.

11. Debtors' Twenty-Third Omnibus Objection to Claims (No Liability - Books and Records Claims) [Docket No. 4358]

Related Document(s):

- a. Notice of Adjournment of Notice of Adjournment of Hearing on Debtors' Twenty-Third Omnibus Objection to Claims (No Liability – Books and Records Claims) Against Ross Thayer to September 11, 2013 at 10:00 a.m. [Docket No. 4827]
- b. Notice of Adjournment of Notice of Adjournment of Hearing on Debtors' Twenty-Third Omnibus Objection to Claims (No Liability – Books and Records Claims) Against Ross Thayer to October 2, 2013 at 10:00 a.m. [Docket No. 4990]

Response(s):

- a. Response of Ross P. Thayer to Debtors' Twenty-Third Omnibus Objection to Claims (No Liability - Books and Records Claims) [Docket No. 4754]

Status: The hearing on this matter as it relates to Ross Thayer has been adjourned to October 2, 2013.

Dated: September 10, 2013
New York, New York

/s/ Gary S. Lee

Gary S. Lee
Lorenzo Marinuzzi
Norman S. Rosenbaum
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for the Debtors and
Debtors in Possession*